

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION, CLEVELAND

TAMARA L. SOBOLEWSKI

Case No. 1:24-cv-01396-JPC

Plaintiff,

Judge J. Philip Calabrese

– v. –

Magistrate Judge Reuben J. Sheperd

FORD MOTOR COMPANY

Defendants.

DEFENDANT FORD MOTOR COMPANY'S REPLY IN  
SUPPORT OF MOTION TO DISMISS

Plaintiff's Complaint should be dismissed because: (1) Plaintiff's allegations are untimely where her employment at Ford ended in 2020; (2) the Complaint lacks a factual basis to support relief; and (3) Plaintiff failed to exhaust administrative remedies required by federal law. Although Plaintiff opposes Defendant's Motion to Dismiss in form, she provides no substantive reason in law or fact that could survive Rule 12(b)(6) scrutiny.<sup>1</sup> Therefore, for the reasons more fully stated in its Motion to Dismiss, Ford respectfully requests that the Court grant its Motion to Dismiss, and dismiss Plaintiff's complaint under Rule 12(b)(6) with prejudice.

Dated: October 31, 2024

Respectfully submitted,

/s/ Samuel E. Endicott

Ronald G. Linville (Ohio 0025803)  
Samuel E. Endicott (Ohio 0094026)  
Allison R. Thomas (Ohio 0090723)  
BAKER & HOSTETLER LLP

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<sup>1</sup> In her opposition, Plaintiff alleges facts and submits additional documents outside the Complaint. But it is “black-letter law” that “a court evaluating a motion for judgment on the pleadings (or a motion to dismiss) must focus only on the allegations in the pleadings.” *Bates v. Green Farms Condominium Ass'n*, 958 F.3d 470, 483 (2020). Thus, these arguments are not properly considered.

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*Counsel for Defendant Ford Motor Company*

**CERTIFICATION**

I hereby certify that the present lawsuit has been recommended by the Court for assignment to the Standard Track (See Doc. 1). I hereby further certify that Ford Motor Company's Reply in Support of Motion to Dismiss Plaintiff's Complaint does not exceed the twenty (20) page limit for Standard Track cases as set forth in Local Rule 7.1(f).

*/s/ Samuel E. Endicott*  
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*Attorney for Ford Motor Company*

**CERTIFICATE OF SERVICE**

I certify that a copy of the foregoing was served via Regular U.S. Mail, postage prepaid, on October 31, 2024, on the following:

Tamara Sobolewski  
1002 Dakota Avenue  
Lorain, OH 44052  
*Pro Se Plaintiff*

/s/ Samuel E. Endicott  
\_\_\_\_\_  
*Attorney for Ford Motor Company*